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Attorneys for Defendants Sequoia's Causey Village
Condominiums LLC, Zeus Holdings, LLC, Brian
Snodgrass, Darcy Lapier Snodgrass and the Darcy
Lapier Snodgrass Trust

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

INDYMAC VENTURE, LLC,

Plaintiff,

v.

**SEQUOIA'S CAUSEY VILLAGE
CONDOMINIUMS LLC**, an Oregon Limited
Liability Company; **ZEUS HOLDINGS,
LLC**, an Oregon Limited Liability Company;
BRIAN SNODGRASS, an individual;
DARCY LAPIER SNODGRASS, trustee of
the **DARCY LAPIER SNODGRASS
TRUST**, a trust; and **OTAK ARCHITECTS,
INC.**, an Oregon Corporation,

Defendants.

No. 3:09-cv-865-HU

**DECLARATION IN SUPPORT OF
PERKINS COIE'S MOTION TO
WITHDRAW AS COUNSEL OF
RECORD FOR THE SEQUOIA
PARTIES**

I, Erick J. Haynie, being first duly sworn, hereby state as follows:

1. I am an attorney at the law firm of Perkins Coie LLP ("Perkins Coie"). I have personal knowledge of the matters set forth below and make this declaration in support of Perkins Coie's motion to withdraw as counsel of record for Defendants Sequoia's Causey Village

Condominiums LLC, Zeus Holdings, LLC, Brian Snodgrass, Darcy Lapier Snodgrass, and the Darcy Lapier Snodgrass Trust (collectively, the "Sequoia Parties").

2. Perkins Coie LLP, through myself and Stephanie K. Hines, has represented the Sequoia Parties in this action.

3. The Sequoia Parties are interrelated. Darcy Lapier Snodgrass is the Trustee of the Darcy Lapier Snodgrass Trust, which along with Brian Snodgrass, co-owns a holding company, Zeus Holdings, LLC. This company, in turn, owns Sequoia's Causey Village Condominiums LLC.

4. I believe withdrawal is appropriate pursuant to the requirements of Oregon Rule of Professional Conduct 1.16. In order to maintain the confidences and secrets of the Sequoia Parties, counsel requests that any further detail regarding representation be presented to the court *in camera*.

5. We have notified the Sequoia Parties of our intent to withdraw as counsel. None of the Sequoia Parties has identified substitute counsel.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 26, 2010.

s/ Erick J. Haynie
Erick J. Haynie

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the State of Oregon that, on March 26, 2010, he caused to be served on the person(s) listed below in the manner shown:

Declaration in Support of Perkins Coie's Motion to Withdraw as Counsel of Record for the Sequoia Parties

Darcy Snodgrass
PO Box 3934
Wilsonville, OR 97070

Sequoia's Causey Village
Condominiums LLC
c/o Sequoia Custom Homes, LLC
(registered agent)
8840 SW Holly Lane, Suite 100
Wilsonville, OR 97070

Darcy Lapier Snodgrass Trust
c/o Darcy Snodgrass
PO Box 3934
Wilsonville, OR 97070

Brian Snodgrass
Owner/President
Sequoia Custom Homes LLC
16869 SW 65th Ave #116
Lake Oswego, OR 97035

Zeus Holdings, LLC
c/o Mary Collins (registered agent)
8840 SW Holly Lane, Suite 100
Wilsonville, OR 97070

Otak Architects, Inc.
c/o Jonathan A. Bennett (registered agent)
851 SW Sixth Avenue, Suite 1500
Portland, OR 97204

- United States Mail, First Class
- By Messenger
- By Facsimile
- By eFiling

Dated at Portland, Oregon, this 26th day of March, 2010.

s/ Erick J. Haynie

Erick J. Haynie